

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES, *et al.*,**

***Plaintiffs,***

**- against -**

**GOOGLE LLC,**

***Defendant.***

**Civil Action No. 1:23-cv-00108-  
LMB-JFA**

**GOOGLE LLC's FIRST SET OF REQUESTS FOR PRODUCTION  
TO THE UNITED STATES**

Pursuant to Federal Rules of Civil Procedure 26 and 34 ("Federal Rules"), Defendant Google LLC hereby requests that Plaintiff United States produce documents responsive to the requests set forth below.

**INSTRUCTIONS**

1. In addition to the specific instructions set forth below, these Requests incorporate the instructions set forth in Federal Rules 26 and 34, the Local Rules of the United States District Court for the Eastern District of Virginia ("Local Rules"), the Stipulation and Order Regarding Discovery Procedure ("ESI Order") (to be entered), and the Confidentiality Order (to be entered), or the operative version of those Orders in place at the time production is made. Subject to a valid claim of privilege, please produce the entire document if any part of that document is responsive.

2. Please produce all requested documents in Your possession, custody, or control, or available to You, or to which You may gain access through reasonable effort, including

Your complaint) or has used Ad Tech Products or Display Advertising during the Relevant Period, produce all documents reflecting its document retention policies and any changes thereto.

**REQUEST FOR PRODUCTION NO. 37:** Separately for each agency and department of the United States that is a “buyer[] of open web display advertising” (as alleged in Paragraph 341 of Your complaint) or has used Ad Tech Products or Display Advertising during the Relevant Period, produce all documents concerning information and advice about Display Advertising (including studies, analyses, and reports) received from advertising consultants or Agencies and information shared with advertising consultants or Agencies about Display Advertising.

**REQUEST FOR PRODUCTION NO. 38:** All documents that You received from the Federal Trade Commission concerning any investigation, whether formal or informal, that You or the Federal Trade Commission have considered or conducted since 2007 into Google’s Ad Tech Products or Display Advertising business, including documents concerning Google’s acquisitions of DoubleClick, AdMob, Invite Media, or AdMeld.

**REQUEST FOR PRODUCTION NO. 39:** All documents You exchanged with the Federal Trade Commission concerning the initiation of any investigation, whether formal or informal, related to Google’s Ad Tech Products or Display Advertising business, including preliminary investigation memoranda and communications concerning the clearance process.

**REQUEST FOR PRODUCTION NO. 40:** All documents concerning any questions, concerns, inquiries, or complaints, whether formal or informal, related to Assistant Attorney General Jonathan Kanter’s participation in the Investigation and/or this Action, including the decision to bring this Action, in light of his (a) prior representation of providers of Ad Tech Products and/or organizations connected to Display Advertising; or (b) actual or perceived adversity to Google.